



related disability by the Army Physical Disability Agency.

6. Plaintiff applied for Combat Related Special Compensation (CRSC) and was denied those benefits by the Army.
7. Even though the same evidentiary standards are utilized by the Army for determining combat-relatedness for disability purposes and for CRSC purposes, the Army determined that Plaintiff had not shown his disability was combat related for CRSC purposes.
8. This complaint relates to two Freedom of Information Act/Privacy Act (FOI/P) requests submitted by Plaintiff in order to obtain information relevant to his CRSC claim and the standards used by the CRSC program in adjudicating his claim.
9. Both requests were submitted to the Army through the FOIA.GOV web site on June 27, 2019. The Army is a participating agency in the FOIA.GOV portal. The content of each FOI/P request is contained in the receipt documents generated by the FOIA.GOV web site that is attached hereto as Exhibits "A" and "B".
10. The Army has not responded to the requests within the time provided by law. Accordingly, Plaintiff has exhausted his administrative remedies.

**Relief Requested**

WHEREFORE, Plaintiff prays that this Honorable Court:

- a. Order Defendant to release the requested documents on a timely basis;
- b. Award Plaintiff attorney fees and costs.

Respectfully submitted  
*s/ Jason W. Manne*  
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Dated: September 11, 2019  
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